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January 17, 2025

**By ECF**

The Honorable Tonianne J. Bongiovanni,  
United States Magistrate Judge  
United States District Court for the  
District of New Jersey  
Clarkson S. Fisher Federal Building and United States Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *Kumar, et al. v. Bochasanwasi Shri Akshar Purushottam Swaminarayan Sanstha, Inc., et al.*, No. 21-CV-11048 (GC)(TJB)

Dear Judge Bongiovanni:

Our office, along with Radford Scott, LLP and Kakalec Law PLLC, represents Plaintiffs Mukesh Kumar, Davi Laal, Niranjana, Mahendra Kumar, Rama Ram, Ramesh Kumar, Deva Ram, Rupa Ram, and Khima Ram Rebari in the above-referenced case. We write jointly with counsel for Defendants Bochasanwasi Shri Akshar Purushottam Swaminarayan Sanstha, Inc., BAPS Atlanta, LLC, BAPS Chicago, LLC, BAPS Chino Hills, LLC, BAPS Houston, LLC, BAPS Mercer, LLC, BAPS Robbinsville, LLC, BAPS Development, Inc., BAPS Fellowship Services, Inc., Bharat Patel, a/k/a Bharat Doe a/k/a Bharat Bhai, Kanu Patel, Pankaj Patel, Swami Prasanand a/k/a Prashant Darshan Das Sadhu, and Rakesh Patel to provide the Court with an update as directed in the Court's October 21, 2024 Text Order, ECF No. 74.

The government's investigation is ongoing, and they have not given counsel in the above-referenced matter any timeframe as to when they expect the investigation to conclude. Plaintiffs' counsel asked the government for an update on the status of the criminal investigation and were informed that the government investigation is still ongoing, and that it still includes investigation into allegations of human trafficking-related (Chapter 77) offenses. Because the investigation is ongoing, Defendants' position is that the Trafficking Victims Protection Act, 18 U.S.C. § 1595(b),

requires that the stay—entered by the Court on the parties’ consent in November 2021—remain in effect pending the conclusion of the government investigation.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Andrew Glenn  
Andrew Glenn

*Counsel for Plaintiffs Mukesh Kumar, Davi  
Laal, Niranjana, Mahendra Kumar, Rama  
Ram, Ramesh Kumar, Deva Ram, Rupa  
Ram, and Khima Ram Rebari, the Proposed  
FLSA Collective, and the Proposed Classes*